

### REMARKS

Reconsideration and allowance of this application are respectfully requested in light of the above amendments and the following remarks.

The specification has been amended to delete the embedded hyperlinks as required in Section 1 of the office action and to remove the term "means."

A Replacement Sheet for Fig. 8 is submitted with a Submission of Proposed Drawing Amendments to remove the term "means" from this drawing.

Claim 1 has been amended to correct a grammatical error, and claim 5 has been amended to place elements in non-means-plus function format. These claims amendments are considered to be non-narrowing, and no estoppel should be deemed to attach thereto.

Claims 1 and 4-6 stand rejected under 35 USC 103(a) as unpatentable over Carlsson et al. (USPN 5,970,408) in view of Bender et al. (USPN 6,888,805). Claim 2 stands rejected under 35 USC 103(a) as unpatentable over Carlsson (USPN 5,970,408) in view of Bender et al. (USPN 6,888,805) and Meier (US 2005/180345). Claim 3 stands rejected under 35 USC 103(a) as unpatentable over Carlsson et al. (USPN 5,970,408) in view of Bender et al. (USPN 6,888,805) and Gavrilovich (USPN 6,026,277). The Applicants

respectfully traverse these rejections based on the points set forth below.

With respect to Carlsson et al., the office action cites Figs. 1, 5 and 6 and col. 6, lines 32-40, col. 7, lines 9-20, col. 8, lines 10-22, and col. 12, lines 16-24 and 31-36. These portions of the reference disclose a cellular communication system in which a group of mobile units is positioned to travel together for example on a train. Control circuitry generates common control requests to control operation of the entire group of mobile units. The control circuitry generates a common hand-off request for the entire group of mobile units so that each mobile unit need not independently generate a hand-off request. Control signals are transmitted to the individual ones of the mobile units to re-tune the mobile units and effectuate hand-offs of the mobile units.

The office action states that Carlsson et al. is deficient vis-a-vis the present claims in that Carlsson et al. fails to disclose staggering of transmission times. In an attempt to cure the deficiencies of Carlsson et al., the office action cites Bender et al.

With respect to Bender et al., the office action cites Fig. 3, the Abstract, col. 2, lines 40-53 and 65-67, col. 5, lines 39-49 and col. 11, lines 52-67. These portions of the reference

disclose a "time multiplexed" transmission scheme for reducing cell interference among cells operated at the same frequency band. Transmissions from the cells are staggered over different time slots such that a set of one or more cells is designated to transmit in each of a number of slot phases. That is, a first set of one or more cells may be designated to transmit in one time slot, a second set of one or more cells may be designated to transmit in the next time slot, and so on. In this way, the cells transmit in a staggered manner in the slot phases to reduce interference.

The Office Action states that Bender et al. discloses a time division multiplexing scheme where the users (mobile units) in a particular group (cell) only transmit in their specified time slot allotted to the set of one or more cells.

The Applicants note, however, that Bender et al. merely discloses that users in each cell transmit in designated time intervals (e.g., time slots) so that transmissions from the cells are staggered over different time slots, thereby reducing interference from other cells. In other words, Bender et al. merely discloses that transmission schedules of a plurality of cells are determined in a manner so as not to interfere with each other.

On the other hand, Carlsson et al. and Bender et al., taken alone or together, fail to disclose or suggest the following features of claim 1:

(i) A plurality of terminals switching connections are grouped into a plurality of groups.

(ii) Terminals in a particular group switch connections at the same time (i.e., at the same time slot).

Therefore, when considering the teachings of Carlsson et al. with those of Bender et al., it may have been obvious to a person having ordinary skill in the art that, in the system illustrated in present application Fig. 1 or 4, each of base stations (e.g., BS 35) or each of mobile routers (e.g., MR 15) could transmit in designated time intervals so as not to interfere with each other because Bender et al. discloses that cell transmission times are staggered to avoid interference among a plurality of cells.

However, Bender et al. fails to disclose the above items (i) and (ii) recited in claim 1.

Accordingly, it is submitted that a person of ordinary skill in the art would not have been led to the invention of claim 1 from the combined teachings of Carlsson et al. and Bender et al.

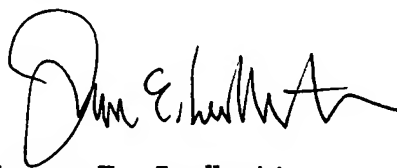
Claims 2-6 are considered to be allowable due to their dependence from allowable claim 1 and also due to their recitation of subject matter that provides an independent basis

for their individual allowability. For example, claim 3 recites that an overlap range is provided where a communicable range connectable to the one gate and a communicable range connectable to the other gate overlap with each other, and all the connections of the plurality of terminals are switched within a time period in which the plurality of terminals exist in the overlap range.

Accordingly, in light of the foregoing, it is submitted that all pending claims are directed to allowable subject matter, and a notice of allowance is respectfully requested.

If any issues remain which may best be resolved through a telephone communication, the examiner is requested to telephone the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,



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IN THE DRAWINGS

A proposed change to Fig. 8 is submitted herewith along with  
a Submission of Proposed Drawing Amendments.



## FIG. 8

